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5 Attorney for Defendant
6 BRYAN PAUL TAMBLYN

7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE EASTERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,) Case No. 2:20-cr-00014-KJM
10 Plaintiff,)
11 vs.) STIPULATION FOR MODIFICATION OF
12 BRYAN PAUL TAMBLYN,) CONDITIONS OF PRETRIAL RELEASE TO
Defendant.) CONVERT HOME DETENTION TO CURFEW;
13) [PROPOSED] ORDER
14) Hon. Jeremy D. Peterson
15)
16)

At the request of Pretrial Services, the defendant, BRYAN PAUL TAMBLYN, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Christina McCall, hereby stipulate to and request an order from this Court modifying the conditions of Mr. Tamblyn's pretrial release by removing Special Condition of Release Number Fifteen (15), "Home Detention" and replacing it with a new Special Condition of "Curfew" from 8:00 p.m. to 8:00 a.m.

The parties request the following language replace the existing Special Condition 15:

"CURFEW: You must remain inside your residence from 8:00 p.m. until 8:00 a.m. every day, except for employment, education, religious services, medical, substance abuse, or mental health treatment, attorney visits, court appearances, court ordered obligations, or other activities pre-approved by the pretrial services officer."

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Mr. Tamblyn has been on pretrial release in this district since February 2020, on a \$50,000 unsecured appearance bond as well as an appearance bond secured by deeds of trust and co-signed by his uncle, Jerome Espinosa and grandfather, Richard Espinosa. *See* Dkt. 26 (unsecured appearance bond) and Dkt. 29 (appearance bond secured by deeds of trust). Additionally, Mr. Tamblyn has three (3) appointed third party custodians: Richard Espinosa, Sr., Jerome Espinosa, and Sheri Placencia. Mr. Tamblyn has remained in compliance with all of his conditions of release throughout his time on supervision.

The conversion of Mr. Tamblyn's location monitoring condition to curfew will permit Mr. Tamblyn to regularly exercise outside of his home, spend more time with his family, and develop healthy social habits, all of which are goals which have been repeatedly recommended by Mr. Tamblyn's mental health counselor. The parties agree and recommend that all other conditions remain in full force and effect. The proposed amended condition is attached to this request. The parties do not request a hearing in this matter in light of this stipulation.

Respectfully submitted,

DATED: August 4, 2021

HEATHER E. WILLIAMS

Federal Defender

/s/ Megan T. Hopkins
MEGAN T. HOPKINS
Assistant Federal Defender
Attorney for BRYAN PAUL TAMBLYN

DATED: August 4, 2021

PHILLIP A. TALBERT

Acting United States Attorney

/s/ Christina McCall
CHRISTINA MCCALL
Assistant United States Attorney
Attorney for the United States

1 **[PROPOSED] ORDER**

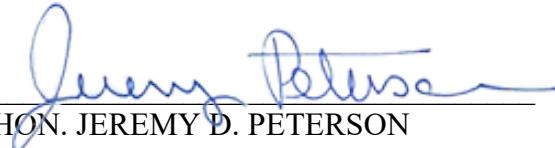
2 GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT Special
3 Condition of Release Number 15 for defendant, Bryan Paul Tamblyn, be Amended to replace the
4 condition of Home Detention with a condition of Curfew, as follows:

5 **CURFEW:** You must remain inside your residence from 8:00 p.m. until 8:00 a.m. every
6 day, except for employment, education, religious services, medical, substance abuse, or mental
7 health treatment, attorney visits, court appearances, court ordered obligations, or other activities
8 pre-approved by the pretrial services officer.

9 All other conditions of pretrial release shall remain in force.

10 The Amended Special Condition of Release is hereby adopted.

11 DATED: August 4, 2021

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13 HON. JEREMY D. PETERSON
14 United States Magistrate Judge